

As a co-owner of the public commons known as "The Spectrum", I am opposed to any rule-making that results in anti-competitive behavior by the licensees thereof.

Although the public spectrum is most efficiently employed when managed by profit-seeking private entities, the FCC is Congressionally mandated to serve as a safety valve to industry practices which thwart the public interest.

It is decidedly against the public interest that a small group of corporate entities control how the public spectrum is used in any given market. This was the evil sought to be averted by the six FCC rules currently under review. By rolling back these protections, the FCC shows itself to be an undemocratic, rogue agency which has strayed from its Congressional charge.

The six ownership rules currently in place are not even sufficient to ensure the diversity of expression necessary for a healthy democracy. To eliminate even these scant protections is ludicrous. If the spectrum were not a public commons, then I would urge the agency to adopt a laissez-faire stance, allowing the market to allocate resources in the most efficient manner. However, radio/television spectrum IS a public resource, and a limited one at that. The entire purpose of the FCC is to ensure that this precious resource is allocated in a way that optimizes the public benefit. Paving the way for greater media consolidation is indisputably contrary to the public benefit.

Among the ills caused by media consolidation:

- 1) When a single corporation owns television stations in every market, the news reporting and other programming is no longer targeted effectively to local interests. Rather, the whole country receives a single version of the news, as told by a single group of corporate shareholders. The same problem occurs with uniform national radio programming; the collapse of regional cultural variations.
- 2) This ill is compounded when only a few such nationwide corporations control all programming in a given market. If one mega-corporation's programming is too generic to be relevant, then the viewer has nowhere else to turn.
- 3) Cross-platform consolidation threatens even more uniformity of viewpoints; if a single company owns both the television and newspaper, or radio and newspaper, in a given market, then there is effectively a monopoly of viewpoints.

When these three phenomena are viewed in concert, it is apparent that the rolling back of media ownership rules will result in a monopoly of public expression, leading to a uniformity of opinions. Those who control the reins of these media conglomerates control the opinions of the public, and thereby control

their political decisionmaking. It is easily evident that placing the influence of the political process in the hands of so few and powerful entities is antidemocratic and un-American. Had such a scenario been presented to the Founders (who had no concept of "public spectrum"), they would surely have written a clause into our Constitution to protect against such evils.

If the FCC fails to act according to its charter in this review, then it will be up to Congress to take up the task, a situation tantamount to the CEO of a corporation having to take over mailroom duties from a recalcitrant clerk. Shame on the Commissioners if they allow this to happen.